## L | LOCKS LAW FIRM

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February 9, 2007

# **VIA ELECTRONIC FILING**

Clerk of the United States District Court District of New Jersey U.S. Courthouse 402 East State Street Trenton, NJ 08608

Re:

Ingram v. Coach USA, et al. Case No.: 2:06-cv-3425 (KSH)

#### Dear Clerk:

On behalf of Plaintiff Jeanine Ingram, in the above-captioned matter, please find enclosed for filing the following documents:

- 1) Notice of Motion for Admission to Practice pro hac vice;
- 2) Certification of Brian L. Bromberg in Support of his *pro hac vice* Admission;
- 3) Proposed Order Granting Admission to Practice pro hac vice; and
- 4) Certificate of Service.

Very truly yours,

/s/ Seth Lesser

Seth R. Lesser

#### Enclosures

### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

JEANINE INGRAM, individually and on Behalf of All other Persons Similarly Situated,

Civil Action

Plaintiffs,

06-3425(KSH)

v.

NOTICE OF MOTION FOR ADMISSION TO

COACH USA, INS. and ORANGE, NEWARK,

TO PRACTICE

ELIZABETH BUS, INC.

PRO HAC VICE

Defendants.

PLEASE TAKE NOTICE that under Local Rule Civil 101 of the United States District Court for the District of the New Jersey, the Locks Law Firm, PLLC, hereby requests the entry of an Order admitting Brian L. Bromberg of the Locks Law Firm, LLC to practice before this Court in this matter pro hac vice, on behalf of plaintiff Jeanine Ingram.

PLEASE TAKE FURTHER NOTICE that the certificate of Brian L. Bromberg in support of the application is submitted with this notice of motion.

PLEASE TAKE FURTHER NOTICE that defendant does not oppose this motion.

PLEASE TAKE FURTHER NOTICE that a form of order on this application is submitted with this notice of motion.

Locks Law Firm, PLLC

By: /s/ Seth Lesser Seth R. Lesser

Attorneys for Plaintiffs

Dated: February 9, 2007

# UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

JEANINE INGRAM, individually and on Behalf of All other Persons Similarly Situated,

Plaintiffs,

Civil Action 06-3425(KSH)

v,

COACH USA, INS. and ORANGE, NEWARK, ELIZABETH BUS, INC.

CERTIFICATE OF BRIAN L. BROMBERG IN SUPPORT OF HIS PRO HAC VICE ADMISSION

Defendants.

I, Brian L. Bromberg, hereby certify as follows:

- I am founder and owner of the Bromberg Law Office, P.C., located at
   Exchange Place, Suite 2010, New York, New York 10005.
- 2. I have been a member in good standing and admitted to practice in the State of New York since 1992 and California since 2006. I am also admitted to many federal trial and appellate courts.
- 3. No disciplinary proceedings are pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.
- 4. I understand that if I am admitted *pro hac vice* I will be subject to the disciplinary jurisdiction of the United States District Court of New Jersey and in accordance with the Local District Rule 101.1(c)(2), will make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Rule 1:28-2(a) for each calendar year in which this case is pending.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on February 9, 2007. New York, New York

Brian L. Bromberg

# Case 2:06-cv-03425-KSH-PS Document 20 Filed 02/09/07 Page 4 of 5 PageID: 76 UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

JEANINE INGRAM, individually and on	:
Behalf of All other Persons Similarly Situated,	:
	: Civil Action
Plaintiffs,	: 06-3425(KSH)
V.	:
COACH USA, INS. and ORANGE, NEWARK, ELIZABETH BUS, INC.	<ul> <li>ORDER GRANTING</li> <li>ADMISSION TO PRACTICE</li> <li>PRO HAC VICE</li> </ul>
Defendants.	: :

This motion having been opened to the Court by Locks Law Firm, PLLC attorneys for plaintiff Jeanine Ingram, upon its application for an order admitting

Brian L. Bromberg, attorney-at-law of the state of New York *pro hac vice*, and the Court having considered the motion and good cause having been shown:

RED as follows

- 1. Brian L. Bromberg is admitted *pro hac vice* to appear in this matter on behalf of plaintiff Jeanine Ingram.
  - 2. Brian L. Bromberg is required to abide by the rules governing this Court.
- 3. Brian L. Bromberg is deemed to consent to the appointment of the Clerk of the Court as agent upon whom service of process may be made for all actions against his law office that may arise out of their participation in this matter.
- 4. Seth R. Lesser of Locks Law Firm and a member of the bar of the Court, has entered an appearance in this case and shall be counsel of record in accordance with Local Civil Rule 101.1(c)(4).

5.	In accordance with Local Civil Rule 101.1(c)(3), Brian L. Bromberg will
make a payme	nt of \$150.00 payable to the Clerk, USDC.

Hon. Patty Shwartz
United States District Magistrate Judge